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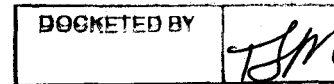
September 14, 2012

Docket Control  
Arizona Corporation Commission  
1200 W. Washington  
Phoenix, AZ 85007

Arizona Corporation Commission

DOCKETED

SEP 14 2012



RE: Arizona Public Service Company's Draft Comments - Seventh Biennial Electric Transmission Assessment for 2012-2021.  
Docket No. E-00000D-11-0017

Arizona Public Service Company ("APS") appreciates the opportunity to provide comments on the Second Draft (Draft - Version 2.0) of the Staff Report for the Seventh Biennial Electric Transmission Assessment. Attached are APS general comments.

If you have any questions regarding this information, please contact me at (602)250-2661.

Sincerely,

Jeffrey W. Johnson

JJ/cd  
Attachment

cc: David Korinek - KEMA Consulting

**Arizona Public Service Company**  
**Comments on the Second Draft of Staff Report in the 7<sup>th</sup> BTA**  
**Docket No. E-00000D-11-0017**

| <b>Section in Report<br/>Draft Version 2.0</b>                     | <b>Proposed Change</b>   | <b>Comment about Section or<br/>Explanation Supporting<br/>Proposed Change</b>  |
|--|--|---|
| Page v,<br>Executive<br>Summary,<br>second paragraph,<br>line 6    | Revise "All entities which made presentations at the first workshop were asked to file the presentations in the docket" by deleting the word "first" and inserting an "s" at the end of "workshop."  |   |
| Page 9,<br>Section 2.0,<br>Table 3                                 | APS's next audit is scheduled for 2013.  |   |
| Page 36,<br>Section 4.10   | Revise this section to reflect that APS's Gila River-Jojoba 500kV line is complete.  |   |
| Page 49,<br>Section 5.2.5,<br>second paragraph,<br>bullets 2 and 3 | Define summer months as "June, July or August." Make conforming changes so that the bullets on page 49 match recommendation number 8 on page 83.   |   |
| Page 51,<br>Section 5.2.5.3  | Change the statement "The Yuma area 7 <sup>th</sup> BTA RMR study was performed by SWAT's Colorado River Transmission (CRT) Subcommittee and..." to "The Yuma area 7 <sup>th</sup> BTA RMR study was performed by APS and coordinated within the Colorado River Transmission (CRT) Subcommittee and ..." |   |
| Page 56,<br>Section 6.1,<br>second paragraph                       | Second sentence, replace "indicated" with "suggested."   |   |
| Page 56,<br>Section 6.1,<br>second paragraph                       | Revise the statement "...and it is expected that WestConnect will soon file for FERC approval as the regional transmission planning organization" to "...and it is expected that the jurisdictional utilities will soon file for FERC approval of WestConnect as their transmission planning region."    | WestConnect will not be filing with FERC, but jurisdictional utilities will. They will specify WestConnect as their transmission planning region. |
| Page 56,<br>Section 6.1,<br>second paragraph                       | In the last sentence, after "are due for" replace "Regional Requirements" with "Regional transmission planning and cost allocation processes" and replace "Inter-regional requirements" with "Inter-regional transmission planning and cost allocation processes."                                       |   |
| Page 57,<br>Section 6.1.2,<br>1) c) and 2) b)                      | In the last sentence, after the word "systems" delete "neighboring systems only in part" and replace with "systems within the State."  |   |

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|--|---|--|
| Page 58,<br>Section 6.1.2,<br>first paragraph                          | Strike the first two sentences beginning with "Transmission providers must remove from FERC...." Replace "There are also 37 balancing authorities that operate independent balancing areas within the WECC interconnection" with "There are also 37 independent balancing authority areas within the WECC interconnection."   |  |
| Throughout Section 6   | Refer to FERC Order 1000 as "Order 1000"  | This change is needed for consistency throughout the document.                 |
| Page 78,<br>Section 7.4,<br>item 3)                                    | Delete the second sentence, which begins "We believe this would...."  |  |
| Page 81,<br>Recommendation No. 4, both sections regarding CCSG efforts | Change the term "suspend" back to "cancel."   | This change is necessary to reflect the intent of CCSG.                        |
| Page 83,<br>Section 8,<br>Recommendation 8, bullets 1-3                | Bullet 1, change "2.5%" to "10%."<br>Bullet 2, insert "unless it is contemporaneously replaced with a transmission or substation facility that meets or exceeds the capacity of the retired facility."<br>Bullet 3, insert "unless it is contemporaneously replaced with a generating unit that meets or exceeds the capacity of the retired unit."<br>Make conforming changes so that Recommendation number 8 matches page 49. | APS believes the percentage to be too low.                                     |